

with polyethylene glycol, resuspending the fibrinogen in solution and reprecipitating the fibrinogen with glycine. Thus, Pines does not disclose precipitating plasma with glycine, because the method of Pines treats plasma with polyethylene glycol. Further, Pines does not disclose the use of fibrinogen for fibroblast migration. The fibrinogen-thrombin composition used as an adhesive may include other protein species, such as serum albumin, gamma globulin, plasminogen, plasma fibronectin and factor XIII.

Gailit relates to the interaction between fibroblasts and the matrix of a fibrin clot. Gailit discloses that fibroblasts can attach to substrates coated with fibrinogen, fibrin or the fibrinogen breakdown product I-9D. Gailit discloses that this attachment is mediated by integrins. Gailit does not, however, teach or suggest a method of enhancing fibroblast migration. In particular, Gailit does not suggest that fibrinogen enhances fibroblast migration, it merely mentions the fact that fibroblasts can attach to substrates coated with fibrinogen. There is no disclosure to suggest that this fact would somehow correlate to enhanced fibroblast migration.

Pines and Gailit are not properly combinable. Pines relates to the use of a tissue adhesive. The art of tissue adhesives seeks to glue tissue together, not to fill a wound. Gailit relates to the interaction between fibroblasts and a fibrin matrix to fill a wound. Accordingly, one skilled in the art of tissue adhesives would not look to Gailit for answers, because Gailit relates to fibroblast interactions, which are irrelevant to the art of tissue adhesives. Likewise, one skilled in the art of fibroblast interactions with a fibrin matrix in a blood clot filling a wound would not look to Pines for answers, because Pines relates exclusively to compositions as tissue adhesives. Accordingly, the

combination of Pines and Gailit is improper and the rejection of claims based on this improper combination should be withdrawn.

Even assuming that the combination of Pines and Gailit is proper, which it is not, the cited combination does not teach the present invention.

Firstly, neither Pines or Gailit (or the combination of Pines and Gailit) teach a method of precipitating plasma with glycine. As discussed above, Pines teaches precipitating plasma with polyethylene glycol to obtain fibrinogen. The fibrinogen is resuspended in solution and reprecipitated with glycine. However, the plasma is not precipitated with glycine. Accordingly, the rejection is improper and should be withdrawn.

Further, neither Pines or Gailit (or the combination of Pines and Gailit) teach a method of enhancing fibroblast migration with any type of fibrinogen, let alone with fibrinogen prepared by precipitating plasma with glycine. Although it is the U.S. Patent and Trademark Office's ("PTO") position that one skilled in the art would have been motivated to use fibrinogen to enhance fibroblast migration, because Gailit teaches the migration of fibroblasts into a wound site via attachment of the fibroblasts to fibrinogen, applicants believe that such a reading of the reference is incorrect. Although Gailit teaches that fibroblasts can attach to substrates coated with fibrinogen, there is no teaching or suggestion in Gailit that the migration of the fibroblasts is a result of the attachment. Consequently, there is no suggestion that fibrinogen would enhance fibroblast migration.

Further, neither of the cited references (or the cited combination) teach or suggest a method of enhancing fibroblast migration with a fibrinogen composition which includes a lipid rich component.

Corrected drawings are submitted herewith under

separate cover to the Draftsman.

In view of the foregoing, applicants believe that this application is in condition for allowance and such allowance is earnestly solicited.

Respectfully submitted,

November 30, 2001
Date

Karla M. Weyand
Karla M. Weyand
Registration No. 40,223

Braman & Rogalskyj, LLP
P.O. Box 352
Canandaigua, New York 14424-0352
Tel: 716-626-5380
Fax: 716-626-5384

Certificate of Mailing - 37 CFR 1.8 (a)	
I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mailing an envelope addressed to : Assistant Commissioner of Patents and Trade- marks, Washington, D.C. 20231, on the date below.	
Nov 30, 2001 Date	<u>Karla M. Weyand</u> Karla M. Weyand